

EXHIBIT 1

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May 29, 2015

VIA HAND DELIVERY

Hon. George B. Daniels
United States District Judge
United States District Court
for the Southern District of New York
500 Pearl Street
New York, New York 10007-1312

Re: *Sokolow, et al. v. Palestinian Liberation Organization, et al.*
Docket No. 04-CV-397 (GBD)(RLE)

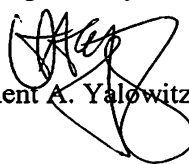
Dear Judge Daniels:

Enclosed are courtesy copies of the following documents:

- Order to Show Cause Why Defendants Should Not Be Ordered to Deposit Funds into the Registry of the Court;
- Declaration of Kent A. Yalowitz in Support of Application for an Order Requiring Defendants to Deposit Funds into the Registry of the Court;
- Memorandum in Support of Application for an Order Directing Defendants to Deposit Funds into the Registry of the Court and in Opposition to Motion to Stay Execution of Judgment and to Waive the Bond Requirement; and
- Declaration of Carmela T. Romeo In Support of Application for an Order Directing Defendants to Deposit Funds into the Registry of the Court and in Opposition to Motion to Stay Execution of Judgment and to Waive the Bond Requirement.

Please let us know if you need any additional information in connection with this filing.

Respectfully,


Kent A. Yalowitz

cc: Gassan A. Baloul
John A. Burlingame

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

MARK I. SOKOLOW, *et al.*,

Plaintiffs,

vs.

THE PALESTINE LIBERATION
ORGANIZATION, *et al.*,

Defendants.

No. 04 Civ. 00397 (GBD) (RLE)

**ORDER TO SHOW CAUSE WHY
DEFENDANTS SHOULD NOT BE ORDERED
TO DEPOSIT FUNDS INTO THE REGISTRY OF THE COURT**

Upon the annexed declaration of Kent A. Yalowitz, dated May 29, 2015, the accompanying Memorandum in Support of Application for an Order Directing Defendants to Deposit Funds into the Registry of the Court and in Opposition to Motion to Stay Execution of Judgment and to Waive the Bond Requirement, dated May 29, 2015, and the declaration of Carmela T. Romeo, dated May 29, 2015, and accompanying exhibits, and all the proceedings had herein, it is hereby

ORDERED, that defendants or their attorneys shall show cause before the Honorable George B. Daniels, a Judge of this Court, at Courtroom 11A, United States District Court House, 500 Pearl Street, New York, New York 10007, on the ____ day of _____ 2015 at ____ o'clock a.m./p.m., or as soon thereafter as counsel may be heard, why an order should not be entered pursuant to Federal Rule of Civil Procedure 67 requiring defendants to deposit installment payments of \$30 million per month into the

registry of the Court starting immediately (up to the full amount of the judgment in this case); and it is

FURTHER ORDERED that responsive papers, if any, to this motion shall be served upon counsel for plaintiffs by ECF on or before the ____ day of _____ 2015; and it is

FURTHER ORDERED that reply papers, if any, shall be served on counsel for defendants by ECF on or before the ____ day of _____ 2015.

SUFFICIENT CAUSE BEING SHOWN, let service by filing with the Court's ECF system of a copy of this Order to Show Cause and the papers on which it is based upon defendants' counsel be deemed good and sufficient service.

ENTER:

George B. Daniels
United States District Judge

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

MARK I. SOKOLOW, *et al.*,

Plaintiffs,

vs.

THE PALESTINE LIBERATION
ORGANIZATION, *et al.*,

Defendants.

No. 04 Civ. 00397 (GBD) (RLE)

**DECLARATION OF KENT A. YALOWITZ IN
SUPPORT OF APPLICATION FOR AN ORDER REQUIRING
DEFENDANTS TO DEPOSIT FUNDS INTO THE REGISTRY OF THE COURT**

KENT A. YALOWITZ hereby declares:

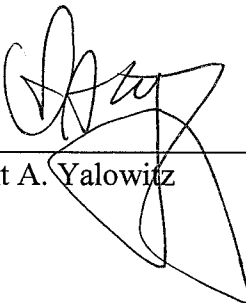
1. I am a member of the bar of this Court and of the law firm of Arnold & Porter LLP, counsel for the plaintiffs in the above-captioned action. I submit this declaration in support of plaintiffs' application for an order to show cause as to why this Court should not require defendants to deposit funds into the registry of the Court—starting immediately and continuing on a monthly basis until the full amount of the judgment in this case is posted—in order to secure payment of the forthcoming judgment. Fed. R. Civ. P. 67.

2. As detailed in the attached Memorandum in Support of Application for an Order Directing Defendants to Deposit Funds into the Registry of the Court and in Opposition to Motion to Stay Execution of Judgment and to Waive the Bond Requirement, defendants have not only engaged in scorched-earth litigation tactics in this case for over a decade, but they also have a documented history of refusing to pay terror judgments against them in other cases, and they have been found by other courts to have dissipated their assets in order to evade collection efforts

by plaintiffs in those other cases. To pretermite a complex and lengthy road to collection ahead, it is imperative that this Court act quickly in order to ensure that plaintiffs are provided with adequate security during the pendency of any appeal.

3. No application for relief sought herein has been made to this or any other Court.
4. I declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York
May 29, 2015



Kent A. Yalowitz